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Attorneys for Defendant
 Club TVPad, Inc. and
 Bennett Wong

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CHINA CENTRAL TELEVISION, a
 China company; CHINA
 INTERNATIONAL
 COMMUNICATIONS CO., LTD., a
 China company; TVB HOLDINGS
 (USA), Inc., a California corporation;
 and DISH NETWORK L.L.C., a
 Colorado corporation,

Plaintiffs,

v.

CREATE NEW TECHNOLOGY (HK)
 LIMITED, a Hong Kong company;
 HUA YANG INTERNATIONAL
 TECHNOLOGY LIMITED, a Hong
 Kong company; SHENZHEN
 GREATVISION NETWORK
 TECHNOLOGY CO., LTD., China
 company; CLUB TVPAD, Inc., a
 California corporation; BENNETT
 WONG, an individual; ASHA MEDIA
 GROUP, INC. d/b/a TVPAD.COM, a
 Florida corporation; AMIT BHALLA,
 an individual; NEWTVPAD LTD.
 COMPANY d/b/a NEWTVAD.COM
 a/k/a TVPAD USA, a Texas
 corporation; LIANGZHONG ZHOU,
 an individual; HONGHUI CHEN d/b/a
 E-DIGITAL, an individual; JOHN
 DOE 1 d/b/a/BETV; JOHN DOE 2
 d/b/a YUE HAI; JOHN DOE 3 d/b/a
 516; JOHN DOE 4 d/b/a HITV; JOHN
 DOE 5 d/b/a GANG YUE; JOHN DOE
 6 d/b/a SPORT ONLINE; JOHN DOE

Case No. CV 15-1869 MMM (AJWx)

**DEFENDANTS CLUB TVPAD,
 INC. AND BENNETT WONG'S
 ANSWER TO PLAINTIFFS'
 COMPLAINT**

Courtroom 780
 The Honorable Margaret M. Morrow

Complaint Filed: March 13, 2015

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 Los Angeles, CA 90036
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1 7 d/b/a GANG TAI WU XIA; and
2 JOHN DOES 8-10,
3 Defendants.

4
5
6 Defendants CLUB TVPAD, INC. and BENNETT WONG

7 (“DEFENDANTS”) hereby responds to plaintiffs’ complaint and admits, denies,
8 and alleges in their Answer as follows:

9 1. Answering paragraph 1, DEFENDANTS state that it is without
10 knowledge or information sufficient to form a belief as to the truth of the
11 allegations of this paragraph, and on that basis denies each and every such
12 allegation.

13 2. Answering paragraph 2, DEFENDANTS state that it is without
14 knowledge or information sufficient to form a belief as to the truth of the
15 allegations of this paragraph, and on that basis denies each and every such
16 allegation.

17 3. Answering paragraph 3, DEFENDANTS state that it is without
18 knowledge or information sufficient to form a belief as to the truth of the
19 allegations of this paragraph, and on that basis denies each and every such
20 allegation.

21 4. Answering paragraph 4, DEFENDANTS state that it is without
22 knowledge or information sufficient to form a belief as to the truth of the
23 allegations of this paragraph, and on that basis denies each and every such
24 allegation.

25 5. Answering paragraph 5, DEFENDANTS state that it is without
26 knowledge or information sufficient to form a belief as to the truth of the
27 allegations of this paragraph, and on that basis denies each and every such

1 allegation.

2 6. Answering paragraph 6, DEFENDANTS state that it is without
3 knowledge or information sufficient to form a belief as to the truth of the
4 allegations of this paragraph, and on that basis denies each and every such
5 allegation.

6 7. Answering paragraph 7, DEFENDANTS state that it is without
7 knowledge or information sufficient to form a belief as to the truth of the
8 allegations of this paragraph, and on that basis denies each and every such
9 allegation.

10 8. Answering paragraph 8, DEFENDANTS state that it is without
11 knowledge or information sufficient to form a belief as to the truth of the
12 allegations of this paragraph, and on that basis denies each and every such
13 allegation.

14 9. Answering paragraph 9, DEFENDANTS state that it is without
15 knowledge or information sufficient to form a belief as to the truth of the
16 allegations of this paragraph, and on that basis denies each and every such
17 allegation.

18 10. Answering paragraph 10, DEFENDANTS state that it is without
19 knowledge or information sufficient to form a belief as to the truth of the
20 allegations of this paragraph, and on that basis denies each and every such
21 allegation.

22 11. Answering paragraph 11, DEFENDANTS state that it is without
23 knowledge or information sufficient to form a belief as to the truth of the
24 allegations of this paragraph, and on that basis denies each and every such
25 allegation.

26 12. Answering paragraph 12, DEFENDANTS state that it is without
27 knowledge or information sufficient to form a belief as to the truth of the
28

1 allegations of this paragraph, and on that basis denies each and every such
2 allegation.

3 13. Answering paragraph 13, DEFENDANTS admit that they have sold
4 and distributed the TV Pad device. As to the remaining allegations in the
5 paragraph, DEFENDANTS state that it is without knowledge or information
6 sufficient to form a belief as to the truth of the allegations of this paragraph, and
7 on that basis denies each and every such allegation.

8 14. Answering paragraph 14, DEFENDANTS state that it is without
9 knowledge or information sufficient to form a belief as to the truth of the
10 allegations of this paragraph, and on that basis denies each and every such
11 allegation.

12 15. Answering paragraph 15, DEFENDANTS state that it is without
13 knowledge or information sufficient to form a belief as to the truth of the
14 allegations of this paragraph, and on that basis denies each and every such
15 allegation.

16 16. Answering paragraph 16, DEFENDANTS state that it is without
17 knowledge or information sufficient to form a belief as to the truth of the
18 allegations of this paragraph, and on that basis denies each and every such
19 allegation.

20 17. Answering paragraph 17, DEFENDANTS state that it is without
21 knowledge or information sufficient to form a belief as to the truth of the
22 allegations of this paragraph, and on that basis denies each and every such
23 allegation.

24 18. Answering paragraph 18, DEFENDANTS state that it is without
25 knowledge or information sufficient to form a belief as to the truth of the
26 allegations of this paragraph, and on that basis denies each and every such
27 allegation.

1 19. Answering paragraph 19, DEFENDANTS state that it is without
2 knowledge or information sufficient to form a belief as to the truth of the
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5 20. Answering paragraph 20, DEFENDANTS state that it is without
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7 allegations of this paragraph, and on that basis denies each and every such
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9 21. Answering paragraph 21, DEFENDANTS state that it is without
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13 22. Answering paragraph 22, DEFENDANTS state that it is without
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15 allegations of this paragraph, and on that basis denies each and every such
16 allegation.

17 23. Answering paragraph 23, DEFENDANTS state that it is without
18 knowledge or information sufficient to form a belief as to the truth of the
19 allegations of this paragraph, and on that basis denies each and every such
20 allegation.

21 24. Answering paragraph 24, DEFENDANTS admit the allegations in the
22 paragraph.

23 25. Answering paragraph 25, DEFENDANTS admit the allegations I nthe
24 paragraph.

25 26. Answering paragraph 26, DEFENDANTS state that it is without
26 knowledge or information sufficient to form a belief as to the truth of the
27 allegations of this paragraph, and on that basis denies each and every such
28

1 allegation.

2 27. Answering paragraph 27, DEFENDANTS state that it is without
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6 28. Answering paragraph 28, DEFENDANTS state that it is without
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10 29. Answering paragraph 29, DEFENDANTS state that it is without
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14 30 Answering paragraph 30, DEFENDANTS state that it is without
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16 allegations of this paragraph, and on that basis denies each and every such
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18 31. Answering paragraph 31, DEFENDANTS state that it is without
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22 32. Answering paragraph 32, DEFENDANTS state that it is without
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24 allegations of this paragraph, and on that basis denies each and every such
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26 33. Answering paragraph 33, DEFENDANTS state that it is without
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3 34. Answering paragraph 34, DEFENDANTS state that it is without
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7 35. Answering paragraph 35, DEFENDANTS state that it is without
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11 36. Answering paragraph 36, DEFENDANTS state that it is without
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15 37. Answering paragraph 37, DEFENDANTS state that it is without
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19 38. Answering paragraph 38, DEFENDANTS state that it is without
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21 allegations of this paragraph, and on that basis denies each and every such
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23 39. Answering paragraph 39, DEFENDANTS state that it is without
24 knowledge or information sufficient to form a belief as to the truth of the
25 allegations of this paragraph, and on that basis denies each and every such
26 allegation.

27 40. Answering paragraph 40, DEFENDANTS state that it is without
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1 knowledge or information sufficient to form a belief as to the truth of the
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4 41. Answering paragraph 41, DEFENDANTS state that it is without
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8 42. Answering paragraph 42, DEFENDANTS state that it is without
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12 43. Answering paragraph 43, DEFENDANTS state that it is without
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16 44. Answering paragraph 44, DEFENDANTS state that it is without
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20 45. Answering paragraph 45, DEFENDANTS state that it is without
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24 46. Answering paragraph 46, DEFENDANTS state that it is without
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1 47. Answering paragraph 47, DEFENDANTS state that it is without
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5 48. Answering paragraph 48, DEFENDANTS state that it is without
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17 51. Answering paragraph 51, DEFENDANTS state that it is without
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21 52. Answering paragraph 52, DEFENDANTS state that it is without
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2 54. Answering paragraph 54, DEFENDANTS state that it is without
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10 56. Answering paragraph 56, DEFENDANTS state that it is without
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14 57. Answering paragraph 57, DEFENDANTS state that it is without
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18 58. Answering paragraph 58, DEFENDANTS state that it is without
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22 59. Answering paragraph 59, DEFENDANTS state that it is without
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26 60. Answering paragraph 60, DEFENDANTS state that it is without
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28

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2 allegation.

3 61. Answering paragraph 61, DEFENDANTS state that it is without
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7 62. Answering paragraph 62, DEFENDANTS state that it is without
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11 63. Answering paragraph 63, DEFENDANTS state that it is without
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15 64. Answering paragraph 64, DEFENDANTS state that it is without
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18 allegation.

19 65. Answering paragraph 65, DEFENDANTS state that it is without
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21 allegations of this paragraph, and on that basis denies each and every such
22 allegation.

23 66. Answering paragraph 66, DEFENDANTS state that it is without
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25 allegations of this paragraph, and on that basis denies each and every such
26 allegation.

27 67. Answering paragraph 67, DEFENDANTS state that it is without
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1 knowledge or information sufficient to form a belief as to the truth of the
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4 68. Answering paragraph 68, DEFENDANTS state that it is without
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7 allegation.

8 69. Answering paragraph 69, DEFENDANTS state that it is without
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12 70. Answering paragraph 70, DEFENDANTS state that it is without
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14 allegations of this paragraph, and on that basis denies each and every such
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16 71. Answering paragraph 71, DEFENDANTS state that it is without
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19 allegation.

20 72. Answering paragraph 72, DEFENDANTS state that it is without
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24 73. Answering paragraph 73, DEFENDANTS state that it is without
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1 74. Answering paragraph 74, DEFENDANTS state that it is without
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9 76. Answering paragraph 76, DEFENDANTS state that it is without
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13 77. Answering paragraph 77, DEFENDANTS state that it is without
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17 78. Answering paragraph 78, DEFENDANTS state that it is without
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21 79. Answering paragraph 79, DEFENDANTS state that it is without
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25 80. Answering paragraph 80, DEFENDANTS state that it is without
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28

1 allegation.

2 81. Answering paragraph 81, DEFENDANTS state that it is without
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4 allegations of this paragraph, and on that basis denies each and every such
5 allegation.

6 82. Answering paragraph 82, DEFENDANTS state that it is without
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8 allegations of this paragraph, and on that basis denies each and every such
9 allegation.

10 83. Answering paragraph 83, DEFENDANTS state that it is without
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14 84. Answering paragraph 84, DEFENDANTS state that it is without
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16 allegations of this paragraph, and on that basis denies each and every such
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18 85. Answering paragraph 85, DEFENDANTS state that it is without
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20 allegations of this paragraph, and on that basis denies each and every such
21 allegation.

22 86. Answering paragraph 86, DEFENDANTS state that it is without
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24 allegations of this paragraph, and on that basis denies each and every such
25 allegation.

26 87. Answering paragraph 87, DEFENDANTS state that it is without
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28

1 allegations of this paragraph, and on that basis denies each and every such
2 allegation.

3 88. Answering paragraph 88, DEFENDANTS state that it is without
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7 89. Answering paragraph 89, DEFENDANTS state that it is without
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11 90. Answering paragraph 90, DEFENDANTS state that it is without
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15 91. Answering paragraph 91, DEFENDANTS state that it is without
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19 92. Answering paragraph 92, DEFENDANTS state that it is without
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23 93. Answering paragraph 93, DEFENDANTS state that it is without
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25 allegations of this paragraph, and on that basis denies each and every such
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27 94. Answering paragraph 94, DEFENDANTS state that it is without

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4 95. Answering paragraph 95, DEFENDANTS state that it is without
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8 96. Answering paragraph 96, DEFENDANTS state that it is without
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12 97. Answering paragraph 97, DEFENDANTS state that it is without
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16 98. Answering paragraph 98, DEFENDANTS state that it is without
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20 99. Answering paragraph 99, DEFENDANTS state that it is without
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22 allegations of this paragraph, and on that basis denies each and every such
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24 100. Answering paragraph 100, DEFENDANTS state that it is without
25 knowledge or information sufficient to form a belief as to the truth of the
26 allegations of this paragraph, and on that basis denies each and every such
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1 108. Answering paragraph 108, DEFENDANTS state that it is without
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3 allegations of this paragraph, and on that basis denies each and every such
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5 109. Answering paragraph 109, DEFENDANTS state that it is without
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9 110. Answering paragraph 110, DEFENDANTS state that it is without
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13 111. Answering paragraph 111, DEFENDANTS state that it is without
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17 112. Answering paragraph 112, DEFENDANTS state that it is without
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21 113. Answering paragraph 113, DEFENDANTS state that it is without
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25 114. Answering paragraph 114, DEFENDANTS state that it is without
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1 allegation.

2 115. Answering paragraph 115, DEFENDANTS state that it is without
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4 allegations of this paragraph, and on that basis denies each and every such
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6 116. Answering paragraph 116, DEFENDANTS state that it is without
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18 119. Answering paragraph 119, DEFENDANTS state that it is without
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24 127. Answering paragraph 172, DEFENDANTS state that it is without
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19 allegations of this paragraph, and on that basis denies each and every such
20 allegation.

21 133. Answering paragraph 133, DEFENDANTS state that it is without
22 knowledge or information sufficient to form a belief as to the truth of the
23 allegations of this paragraph, and on that basis denies each and every such
24 allegation.

25 134. Answering paragraph 134, DEFENDANTS state that it is without
26 knowledge or information sufficient to form a belief as to the truth of the
27 allegations of this paragraph, and on that basis denies each and every such
28

1 allegation.

2 135. Answering paragraph 135, DEFENDANTS state that it is without
3 knowledge or information sufficient to form a belief as to the truth of the
4 allegations of this paragraph, and on that basis denies each and every such
5 allegation.

6 136. Answering paragraph 136, DEFENDANTS state that it is without
7 knowledge or information sufficient to form a belief as to the truth of the
8 allegations of this paragraph, and on that basis denies each and every such
9 allegation.

10 137. Answering paragraph 137, DEFENDANTS state that it is without
11 knowledge or information sufficient to form a belief as to the truth of the
12 allegations of this paragraph, and on that basis denies each and every such
13 allegation.

14 138. Answering paragraph 138, DEFENDANTS state that it is without
15 knowledge or information sufficient to form a belief as to the truth of the
16 allegations of this paragraph, and on that basis denies each and every such
17 allegation.

18 139. Answering paragraph , DEFENDANTS state that it is without
19 knowledge or information sufficient to form a belief as to the truth of the
20 allegations of this paragraph, and on that basis denies each and every such
21 allegation.

22 140. Answering paragraph 140, DEFENDANTS state that it is without
23 knowledge or information sufficient to form a belief as to the truth of the
24 allegations of this paragraph, and on that basis denies each and every such
25 allegation.

26 141. Answering paragraph 141, DEFENDANTS state that it is without
27 knowledge or information sufficient to form a belief as to the truth of the

1 allegations of this paragraph, and on that basis denies each and every such
2 allegation.

3 142. Answering paragraph 142, DEFENDANTS state that it is without
4 knowledge or information sufficient to form a belief as to the truth of the
5 allegations of this paragraph, and on that basis denies each and every such
6 allegation.

7 143. Answering paragraph 143, DEFENDANTS state that it is without
8 knowledge or information sufficient to form a belief as to the truth of the
9 allegations of this paragraph, and on that basis denies each and every such
10 allegation.

11 144. Answering paragraph 144, DEFENDANTS state that it is without
12 knowledge or information sufficient to form a belief as to the truth of the
13 allegations of this paragraph, and on that basis denies each and every such
14 allegation.

15 145. Answering paragraph 145, DEFENDANTS state that it is without
16 knowledge or information sufficient to form a belief as to the truth of the
17 allegations of this paragraph, and on that basis denies each and every such
18 allegation.

19 146. Answering paragraph 146, DEFENDANTS state that it is without
20 knowledge or information sufficient to form a belief as to the truth of the
21 allegations of this paragraph, and on that basis denies each and every such
22 allegation.

23 147. Answering paragraph 147, DEFENDANTS state that it is without
24 knowledge or information sufficient to form a belief as to the truth of the
25 allegations of this paragraph, and on that basis denies each and every such
26 allegation.

27 148. Answering paragraph 148, DEFENDANTS state that it is without
28

1 knowledge or information sufficient to form a belief as to the truth of the
2 allegations of this paragraph, and on that basis denies each and every such
3 allegation.

4 149. Answering paragraph 149, DEFENDANTS state that it is without
5 knowledge or information sufficient to form a belief as to the truth of the
6 allegations of this paragraph, and on that basis denies each and every such
7 allegation.

8 150. Answering paragraph 150, DEFENDANTS state that it is without
9 knowledge or information sufficient to form a belief as to the truth of the
10 allegations of this paragraph, and on that basis denies each and every such
11 allegation.

12 151. Answering paragraph 151, DEFENDANTS state that it is without
13 knowledge or information sufficient to form a belief as to the truth of the
14 allegations of this paragraph, and on that basis denies each and every such
15 allegation.

16 152. Answering paragraph 152, DEFENDANTS state that it is without
17 knowledge or information sufficient to form a belief as to the truth of the
18 allegations of this paragraph, and on that basis denies each and every such
19 allegation.

20 153. Answering paragraph 153, DEFENDANTS state that it is without
21 knowledge or information sufficient to form a belief as to the truth of the
22 allegations of this paragraph, and on that basis denies each and every such
23 allegation.

24 154. Answering paragraph 154, DEFENDANTS state that it is without
25 knowledge or information sufficient to form a belief as to the truth of the
26 allegations of this paragraph, and on that basis denies each and every such
27 allegation.

1 155. Answering paragraph 155, DEFENDANTS state that it is without
2 knowledge or information sufficient to form a belief as to the truth of the
3 allegations of this paragraph, and on that basis denies each and every such
4 allegation.

5 156. Answering paragraph 156, DEFENDANTS admits that defendant
6 Wong is the principal of Club Tvpad, and that he personally owns and operates
7 Club Tvpad.com. DEFENDANTS deny the remaining allegation in the paragraph.

8 157. Answering paragraph 157, DEFENDANTS admit that Club Tvpad
9 has sold Tvpad devices through its website. DEFENDANTS deny the remaining
10 allegation in the paragraph.

11 158. Answering paragraph 158, DEFENDANTS admit the allegations in
12 the paragraph.

13 159. Answering paragraph 159, DEFENDANTS admit the allegations in
14 the paragraph.

15 160. Answering paragraph 160, DEFENDANTS admits that it has
16 marketed the tvpad device on its website. DEFENDANTS deny the remaining
17 allegations in the paragraph.

18 161. Answering paragraph 161, DEFENDANTS state that it currently is
19 without knowledge or information sufficient to form a belief as to the truth of the
20 allegations of this paragraph, and on that basis denies each and every such
21 allegation.

22 162. Answering paragraph 162, DEFENDANTS admit that Club Tvpad
23 hosts a blog whereby others may post notes, comments and/or other statements.
24 DEFENDANTS deny the remaining allegations in the paragraph.

25 163. Answering paragraph 163, DEFENDANTS admit that Club Tvpad
26 hosts a blog whereby others may post notes, comments and/or other statements.
27 DEFENDANTS state that it is without knowledge or information sufficient to
28

1 form a belief as to the truth of the remaining allegations of this paragraph, and on
2 that basis denies each and every such allegation.

3 164. Answering paragraph 164, DEFENDANTS admit that there is a
4 forum entitled "TVB Drama Discussion." DEFENDANTS deny the remaining
5 allegations in the paragraph.

6 165. Answering paragraph 165, DEFENDANTS state that it is without
7 knowledge or information sufficient to form a belief as to the truth of the
8 allegations of this paragraph, and on that basis denies each and every such
9 allegation.

10 166. Answering paragraph 166, DEFENDANTS admit that Club Tvpad
11 has not received authorization by plaintiffs to use the CCTV Marks or TVB marks
12 in commerce.

13 167. Answering paragraph 167, defendant WONG does not specifically
14 recall having any such conversation as described in the paragraph, thus
15 DEFENDANTS state that it is without knowledge or information sufficient to
16 form a belief as to the truth of the allegations of this paragraph, and on that basis
17 denies each and every such allegation.

18 168. Answering paragraph 168, DEFENDANTS state that it is without
19 knowledge or information sufficient to form a belief as to the truth of the
20 allegations of this paragraph, and on that basis denies each and every such
21 allegation.

22 169. Answering paragraph 169, DEFENDANTS do not specifically recall
23 having any such conversation as described in the paragraph, thus DEFENDANTS
24 state that it is without knowledge or information sufficient to form a belief as to
25 the truth of the allegations of this paragraph, and on that basis denies each and
26 every such allegation.

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1 170. Answering paragraph 170, DEFENDANTS state that it is without
2 knowledge or information sufficient to form a belief as to the truth of the
3 allegations of this paragraph, and on that basis denies each and every such
4 allegation.

5 171. Answering paragraph 171, DEFENDANTS state that it is without
6 knowledge or information sufficient to form a belief as to the truth of the
7 allegations of this paragraph, and on that basis denies each and every such
8 allegation.

9 172. Answering paragraph 127, DEFENDANTS state that it is without
10 knowledge or information sufficient to form a belief as to the truth of the
11 allegations of this paragraph, and on that basis denies each and every such
12 allegation.

13 173. Answering paragraph 173, DEFENDANTS state that it is without
14 knowledge or information sufficient to form a belief as to the truth of the
15 allegations of this paragraph, and on that basis denies each and every such
16 allegation.

17 174. Answering paragraph 174, DEFENDANTS deny the allegations in
18 the paragraph.

19 175. Answering paragraph 175, DEFENDANTS state that it is without
20 knowledge or information sufficient to form a belief as to the truth of the
21 allegations of this paragraph, and on that basis denies each and every such
22 allegation.

23 176. Answering paragraph 176, DEFENDANTS state that it is without
24 knowledge or information sufficient to form a belief as to the truth of the
25 allegations of this paragraph, and on that basis denies each and every such
26 allegation.

27 177. Answering paragraph 177, DEFENDANTS state that it is without
28

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Los Angeles, CA 90036
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1 knowledge or information sufficient to form a belief as to the truth of the
2 allegations of this paragraph, and on that basis denies each and every such
3 allegation.

4 178. Answering paragraph 178, DEFENDANTS state that it is without
5 knowledge or information sufficient to form a belief as to the truth of the
6 allegations of this paragraph, and on that basis denies each and every such
7 allegation.

8 179. Answering paragraph 179, DEFENDANTS state that it is without
9 knowledge or information sufficient to form a belief as to the truth of the
10 allegations of this paragraph, and on that basis denies each and every such
11 allegation.

12 180. Answering paragraph 180, DEFENDANTS state that it is without
13 knowledge or information sufficient to form a belief as to the truth of the
14 allegations of this paragraph, and on that basis denies each and every such
15 allegation.

16 181. Answering paragraph 181, DEFENDANTS state that it is without
17 knowledge or information sufficient to form a belief as to the truth of the
18 allegations of this paragraph, and on that basis denies each and every such
19 allegation.

20 182. Answering paragraph 182, DEFENDANTS state that it is without
21 knowledge or information sufficient to form a belief as to the truth of the
22 allegations of this paragraph, and on that basis denies each and every such
23 allegation.

24 183. Answering paragraph 183, DEFENDANTS state that it is without
25 knowledge or information sufficient to form a belief as to the truth of the
26 allegations of this paragraph, and on that basis denies each and every such
27 allegation.

1 184. Answering paragraph 184, DEFENDANTS state that it is without
2 knowledge or information sufficient to form a belief as to the truth of the
3 allegations of this paragraph, and on that basis denies each and every such
4 allegation.

5 185. Answering paragraph 185, DEFENDANTS state that it is without
6 knowledge or information sufficient to form a belief as to the truth of the
7 allegations of this paragraph, and on that basis denies each and every such
8 allegation.

9 186. Answering paragraph 186, DEFENDANTS state that it is without
10 knowledge or information sufficient to form a belief as to the truth of the
11 allegations of this paragraph, and on that basis denies each and every such
12 allegation.

13 187. Answering paragraph 187, DEFENDANTS state that it is without
14 knowledge or information sufficient to form a belief as to the truth of the
15 allegations of this paragraph, and on that basis denies each and every such
16 allegation.

17 188. Answering paragraph 188, DEFENDANTS state that it is without
18 knowledge or information sufficient to form a belief as to the truth of the
19 allegations of this paragraph, and on that basis denies each and every such
20 allegation.

21 189. Answering paragraph 189, DEFENDANTS state that it is without
22 knowledge or information sufficient to form a belief as to the truth of the
23 allegations of this paragraph, and on that basis denies each and every such
24 allegation.

25 190. Answering paragraph 190, DEFENDANTS state that it is without
26 knowledge or information sufficient to form a belief as to the truth of the
27 allegations of this paragraph, and on that basis denies each and every such
28

1 allegation.

2 191. Answering paragraph 191, DEFENDANTS state that it is without
3 knowledge or information sufficient to form a belief as to the truth of the
4 allegations of this paragraph, and on that basis denies each and every such
5 allegation.

6 192. Answering paragraph 192, DEFENDANTS state that it is without
7 knowledge or information sufficient to form a belief as to the truth of the
8 allegations of this paragraph, and on that basis denies each and every such
9 allegation.

10 193. Answering paragraph 193, DEFENDANTS state that it is without
11 knowledge or information sufficient to form a belief as to the truth of the
12 allegations of this paragraph, and on that basis denies each and every such
13 allegation.

14 194. Answering paragraph 194, DEFENDANTS state that it is without
15 knowledge or information sufficient to form a belief as to the truth of the
16 allegations of this paragraph, and on that basis denies each and every such
17 allegation.

18 195. Answering paragraph 195, DEFENDANTS state that it is without
19 knowledge or information sufficient to form a belief as to the truth of the
20 allegations of this paragraph, and on that basis denies each and every such
21 allegation.

22 196. Answering paragraph 196, DEFENDANTS state that it is without
23 knowledge or information sufficient to form a belief as to the truth of the
24 allegations of this paragraph, and on that basis denies each and every such
25 allegation.

26 197. Answering paragraph 197, DEFENDANTS state that it is without
27 knowledge or information sufficient to form a belief as to the truth of the

1 allegations of this paragraph, and on that basis denies each and every such
2 allegation.

3 198. Answering paragraph 198, DEFENDANTS state that it is without
4 knowledge or information sufficient to form a belief as to the truth of the
5 allegations of this paragraph, and on that basis denies each and every such
6 allegation.

7 199. Answering paragraph 199, DEFENDANTS state that it is without
8 knowledge or information sufficient to form a belief as to the truth of the
9 allegations of this paragraph, and on that basis denies each and every such
10 allegation.

11 200. Answering paragraph 200, DEFENDANTS state that it is without
12 knowledge or information sufficient to form a belief as to the truth of the
13 allegations of this paragraph, and on that basis denies each and every such
14 allegation.

15 201. Answering paragraph 201, DEFENDANTS state that it is without
16 knowledge or information sufficient to form a belief as to the truth of the
17 allegations of this paragraph, and on that basis denies each and every such
18 allegation.

19 202. Answering paragraph 202, DEFENDANTS state that it is without
20 knowledge or information sufficient to form a belief as to the truth of the
21 allegations of this paragraph, and on that basis denies each and every such
22 allegation.

23 203. Answering paragraph 203, DEFENDANTS state that it is without
24 knowledge or information sufficient to form a belief as to the truth of the
25 allegations of this paragraph, and on that basis denies each and every such
26 allegation.

27 204. Answering paragraph 204, DEFENDANTS state that it is without

1 knowledge or information sufficient to form a belief as to the truth of the
2 allegations of this paragraph, and on that basis denies each and every such
3 allegation.

4 205. Answering paragraph 205, DEFENDANTS state that it is without
5 knowledge or information sufficient to form a belief as to the truth of the
6 allegations of this paragraph, and on that basis denies each and every such
7 allegation.

8 206. Answering paragraph 206, DEFENDANTS state that it is without
9 knowledge or information sufficient to form a belief as to the truth of the
10 allegations of this paragraph, and on that basis denies each and every such
11 allegation.

12 207. Answering paragraph 207, DEFENDANTS state that it is without
13 knowledge or information sufficient to form a belief as to the truth of the
14 allegations of this paragraph, and on that basis denies each and every such
15 allegation.

16 208. Answering paragraph 208, DEFENDANTS state that it is without
17 knowledge or information sufficient to form a belief as to the truth of the
18 allegations of this paragraph, and on that basis denies each and every such
19 allegation.

20 209. Answering paragraph 209, DEFENDANTS state that it is without
21 knowledge or information sufficient to form a belief as to the truth of the
22 allegations of this paragraph, and on that basis denies each and every such
23 allegation.

24 210. Answering paragraph 210, DEFENDANTS state that it is without
25 knowledge or information sufficient to form a belief as to the truth of the
26 allegations of this paragraph, and on that basis denies each and every such
27

1 allegation.

2 211. Answering paragraph 211, DEFENDANTS state that it is without
3 knowledge or information sufficient to form a belief as to the truth of the
4 allegations of this paragraph, and on that basis denies each and every such
5 allegation.

6 212. Answering paragraph 212, DEFENDANTS state that it is without
7 knowledge or information sufficient to form a belief as to the truth of the
8 allegations of this paragraph, and on that basis denies each and every such
9 allegation.

10 213. Answering paragraph 213, DEFENDANTS state that it is without
11 knowledge or information sufficient to form a belief as to the truth of the
12 allegations of this paragraph, and on that basis denies each and every such
13 allegation.

14 214. Answering paragraph 214, DEFENDANTS state that it is without
15 knowledge or information sufficient to form a belief as to the truth of the
16 allegations of this paragraph, and on that basis denies each and every such
17 allegation.

18 215. Answering paragraph 215, DEFENDANTS state that it is without
19 knowledge or information sufficient to form a belief as to the truth of the
20 allegations of this paragraph, and on that basis denies each and every such
21 allegation.

22 216. Answering paragraph 216, DEFENDANTS state that it is without
23 knowledge or information sufficient to form a belief as to the truth of the
24 allegations of this paragraph, and on that basis denies each and every such
25 allegation.

26 217. Answering paragraph 217, DEFENDANTS state that it is without
27 knowledge or information sufficient to form a belief as to the truth of the

1 allegations of this paragraph, and on that basis denies each and every such
2 allegation.

3 218. Answering paragraph 218, DEFENDANTS state that it is without
4 knowledge or information sufficient to form a belief as to the truth of the
5 allegations of this paragraph, and on that basis denies each and every such
6 allegation.

7 219. Answering paragraph 219, DEFENDANTS state that it is without
8 knowledge or information sufficient to form a belief as to the truth of the
9 allegations of this paragraph, and on that basis denies each and every such
10 allegation.

11 220. Answering paragraph 220, DEFENDANTS state that it is without
12 knowledge or information sufficient to form a belief as to the truth of the
13 allegations of this paragraph, and on that basis denies each and every such
14 allegation.

15 221. Answering paragraph 221, DEFENDANTS state that it is without
16 knowledge or information sufficient to form a belief as to the truth of the
17 allegations of this paragraph, and on that basis denies each and every such
18 allegation.

19 222. Answering paragraph 222, DEFENDANTS state that it is without
20 knowledge or information sufficient to form a belief as to the truth of the
21 allegations of this paragraph, and on that basis denies each and every such
22 allegation.

23 223. Answering paragraph 223, DEFENDANTS state that it is without
24 knowledge or information sufficient to form a belief as to the truth of the
25 allegations of this paragraph, and on that basis denies each and every such
26 allegation.

27 224. Answering paragraph 224, DEFENDANTS state that it is without
28

1 knowledge or information sufficient to form a belief as to the truth of the
2 allegations of this paragraph, and on that basis denies each and every such
3 allegation.

4 225. Answering paragraph 225, DEFENDANTS state that it is without
5 knowledge or information sufficient to form a belief as to the truth of the
6 allegations of this paragraph, and on that basis denies each and every such
7 allegation.

8 226. Answering paragraph 226, DEFENDANTS state that it is without
9 knowledge or information sufficient to form a belief as to the truth of the
10 allegations of this paragraph, and on that basis denies each and every such
11 allegation.

12 227. Answering paragraph 227, DEFENDANTS state that it is without
13 knowledge or information sufficient to form a belief as to the truth of the
14 allegations of this paragraph, and on that basis denies each and every such
15 allegation.

16 228. Answering paragraph 228, DEFENDANTS state that it is without
17 knowledge or information sufficient to form a belief as to the truth of the
18 allegations of this paragraph, and on that basis denies each and every such
19 allegation.

20 229. Answering paragraph 229, DEFENDANTS state that it is without
21 knowledge or information sufficient to form a belief as to the truth of the
22 allegations of this paragraph, and on that basis denies each and every such
23 allegation.

24 230. Answering paragraph 230, DEFENDANTS state that it is without
25 knowledge or information sufficient to form a belief as to the truth of the
26 allegations of this paragraph, and on that basis denies each and every such
27 allegation.

1 231. Answering paragraph 231, DEFENDANTS state that it is without
2 knowledge or information sufficient to form a belief as to the truth of the
3 allegations of this paragraph, and on that basis denies each and every such
4 allegation.

5 232. Answering paragraph 232, DEFENDANTS state that it is without
6 knowledge or information sufficient to form a belief as to the truth of the
7 allegations of this paragraph, and on that basis denies each and every such
8 allegation.

9 233. Answering paragraph 233, DEFENDANTS state that it is without
10 knowledge or information sufficient to form a belief as to the truth of the
11 allegations of this paragraph, and on that basis denies each and every such
12 allegation.

13 234. Answering paragraph 234, DEFENDANTS state that it is without
14 knowledge or information sufficient to form a belief as to the truth of the
15 allegations of this paragraph, and on that basis denies each and every such
16 allegation.

17 235. Answering paragraph 235, DEFENDANTS state that it is without
18 knowledge or information sufficient to form a belief as to the truth of the
19 allegations of this paragraph, and on that basis denies each and every such
20 allegation.

21 236. Answering paragraph 236, DEFENDANTS state that it is without
22 knowledge or information sufficient to form a belief as to the truth of the
23 allegations of this paragraph, and on that basis denies each and every such
24 allegation.

25 237. Answering paragraph 237, DEFENDANTS state that it is without
26 knowledge or information sufficient to form a belief as to the truth of the
27 allegations of this paragraph, and on that basis denies each and every such
28

1 allegation.

2 238. Answering paragraph 238, DEFENDANTS state that it is without
3 knowledge or information sufficient to form a belief as to the truth of the
4 allegations of this paragraph, and on that basis denies each and every such
5 allegation.

6 239. Answering paragraph 239, DEFENDANTS state that it is without
7 knowledge or information sufficient to form a belief as to the truth of the
8 allegations of this paragraph, and on that basis denies each and every such
9 allegation.

10 240. Answering paragraph 240, DEFENDANTS state that it is without
11 knowledge or information sufficient to form a belief as to the truth of the
12 allegations of this paragraph, and on that basis denies each and every such
13 allegation.

14 241. Answering paragraph 241, DEFENDANTS state that it is without
15 knowledge or information sufficient to form a belief as to the truth of the
16 allegations of this paragraph, and on that basis denies each and every such
17 allegation.

18 242. Answering paragraph 242, DEFENDANTS state that it is without
19 knowledge or information sufficient to form a belief as to the truth of the
20 allegations of this paragraph, and on that basis denies each and every such
21 allegation.

22 243. Answering paragraph 243, DEFENDANTS state that it is without
23 knowledge or information sufficient to form a belief as to the truth of the
24 allegations of this paragraph, and on that basis denies each and every such
25 allegation.

26 244. Answering paragraph 244, DEFENDANTS state that it is without
27 knowledge or information sufficient to form a belief as to the truth of the

1 allegations of this paragraph, and on that basis denies each and every such
2 allegation.

3 245. Answering paragraph 245, DEFENDANTS state that it is without
4 knowledge or information sufficient to form a belief as to the truth of the
5 allegations of this paragraph, and on that basis denies each and every such
6 allegation.

7 246. Answering paragraph 246, DEFENDANTS state that it is without
8 knowledge or information sufficient to form a belief as to the truth of the
9 allegations of this paragraph, and on that basis denies each and every such
10 allegation.

11 247. Answering paragraph 247, DEFENDANTS state that it is without
12 knowledge or information sufficient to form a belief as to the truth of the
13 allegations of this paragraph, and on that basis denies each and every such
14 allegation.

15 248. Answering paragraph 248, DEFENDANTS state that it is without
16 knowledge or information sufficient to form a belief as to the truth of the
17 allegations of this paragraph, and on that basis denies each and every such
18 allegation.

19 249. Answering paragraph 249, DEFENDANTS state that it is without
20 knowledge or information sufficient to form a belief as to the truth of the
21 allegations of this paragraph, and on that basis denies each and every such
22 allegation.

23 250. Answering paragraph 250, DEFENDANTS state that it is without
24 knowledge or information sufficient to form a belief as to the truth of the
25 allegations of this paragraph, and on that basis denies each and every such
26 allegation.

27 251. Answering paragraph 161, DEFENDANTS state that it is without
28

1 knowledge or information sufficient to form a belief as to the truth of the
2 allegations of this paragraph, and on that basis denies each and every such
3 allegation.

4 252. Answering paragraph 252, DEFENDANTS state that it is without
5 knowledge or information sufficient to form a belief as to the truth of the
6 allegations of this paragraph, and on that basis denies each and every such
7 allegation.

8 253. Answering paragraph 253, DEFENDANTS state that it is without
9 knowledge or information sufficient to form a belief as to the truth of the
10 allegations of this paragraph, and on that basis denies each and every such
11 allegation.

12 254. Answering paragraph 254, DEFENDANTS state that it is without
13 knowledge or information sufficient to form a belief as to the truth of the
14 allegations of this paragraph, and on that basis denies each and every such
15 allegation.

16 255. Answering paragraph 255, DEFENDANTS state that it is without
17 knowledge or information sufficient to form a belief as to the truth of the
18 allegations of this paragraph, and on that basis denies each and every such
19 allegation.

20 256. Answering paragraph 166, DEFENDANTS state that it is without
21 knowledge or information sufficient to form a belief as to the truth of the
22 allegations of this paragraph, and on that basis denies each and every such
23 allegation.

24 257. Answering paragraph 257, DEFENDANTS state that it is without
25 knowledge or information sufficient to form a belief as to the truth of the
26 allegations of this paragraph, and on that basis denies each and every such
27 allegation.

1 258. Answering paragraph 258, DEFENDANTS state that it is without
2 knowledge or information sufficient to form a belief as to the truth of the
3 allegations of this paragraph, and on that basis denies each and every such
4 allegation.

5 259. Answering paragraph 259, DEFENDANTS do not specifically recall
6 having any such conversation as described in the paragraph, thus DEFENDANTS
7 state that it is without knowledge or information sufficient to form a belief as to
8 the truth of the allegations of this paragraph, and on that basis denies each and
9 every such allegation.

10 260. Answering paragraph 260, DEFENDANTS state that it is without
11 knowledge or information sufficient to form a belief as to the truth of the
12 allegations of this paragraph, and on that basis denies each and every such
13 allegation.

14 261. Answering paragraph 261, DEFENDANTS admit that defendant
15 Wong is a shareholder of defendant Club Tvpad. DEFENDANTS deny the
16 remaining allegations of the paragraph.

17 262. Answering paragraph 262, DEFENDANTS state that it is without
18 knowledge or information sufficient to form a belief as to the truth of the
19 allegations of this paragraph, and on that basis denies each and every such
20 allegation.

21 263. Answering paragraph 263, DEFENDANTS state that it is without
22 knowledge or information sufficient to form a belief as to the truth of the
23 allegations of this paragraph, and on that basis denies each and every such
24 allegation.

25 264. Answering paragraph 264, DEFENDANTS state that it is without
26 knowledge or information sufficient to form a belief as to the truth of the
27 allegations of this paragraph, and on that basis denies each and every such
28

1 allegation.

2 265. Answering paragraph 265, DEFENDANTS state that it is without
3 knowledge or information sufficient to form a belief as to the truth of the
4 allegations of this paragraph, and on that basis denies each and every such
5 allegation.

6 266. Answering paragraph 266, DEFENDANTS state that it is without
7 knowledge or information sufficient to form a belief as to the truth of the
8 allegations of this paragraph, and on that basis denies each and every such
9 allegation.

10 267. Answering paragraph 267, DEFENDANTS state that it is without
11 knowledge or information sufficient to form a belief as to the truth of the
12 allegations of this paragraph, and on that basis denies each and every such
13 allegation.

14 268. Answering paragraph 268, DEFENDANTS state that it is without
15 knowledge or information sufficient to form a belief as to the truth of the
16 allegations of this paragraph, and on that basis denies each and every such
17 allegation.

18 269. Answering paragraph 269, DEFENDANTS state that it is without
19 knowledge or information sufficient to form a belief as to the truth of the
20 allegations of this paragraph, and on that basis denies each and every such
21 allegation.

22 270. Answering paragraph 270, DEFENDANTS state that it is without
23 knowledge or information sufficient to form a belief as to the truth of the
24 allegations of this paragraph, and on that basis denies each and every such
25 allegation.

26 271. Answering paragraph 271, DEFENDANTS state that it is without
27 knowledge or information sufficient to form a belief as to the truth of the

1 allegations of this paragraph, and on that basis denies each and every such
2 allegation.

3 272. Answering paragraph 272, DEFENDANTS state that it is without
4 knowledge or information sufficient to form a belief as to the truth of the
5 allegations of this paragraph, and on that basis denies each and every such
6 allegation.

7 273. Answering paragraph 273, DEFENDANTS state that it is without
8 knowledge or information sufficient to form a belief as to the truth of the
9 allegations of this paragraph, and on that basis denies each and every such
10 allegation.

11 274. Answering paragraph 274, DEFENDANTS state that it is without
12 knowledge or information sufficient to form a belief as to the truth of the
13 allegations of this paragraph, and on that basis denies each and every such
14 allegation.

15 275. Answering paragraph 275, DEFENDANTS state that it is without
16 knowledge or information sufficient to form a belief as to the truth of the
17 allegations of this paragraph, and on that basis denies each and every such
18 allegation.

19 276. Answering paragraph 276, DEFENDANTS state that it is without
20 knowledge or information sufficient to form a belief as to the truth of the
21 allegations of this paragraph, and on that basis denies each and every such
22 allegation.

23 277. Answering paragraph 277, DEFENDANTS state that it is without
24 knowledge or information sufficient to form a belief as to the truth of the
25 allegations of this paragraph, and on that basis denies each and every such
26 allegation.

27 278. Answering paragraph 278, DEFENDANTS state that it is without
28

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Los Angeles, CA 90036
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1 knowledge or information sufficient to form a belief as to the truth of the
2 allegations of this paragraph, and on that basis denies each and every such
3 allegation.

4 279. Answering paragraph 279, DEFENDANTS state that it is without
5 knowledge or information sufficient to form a belief as to the truth of the
6 allegations of this paragraph, and on that basis denies each and every such
7 allegation.

8 280. Answering paragraph 280, DEFENDANTS state that it is without
9 knowledge or information sufficient to form a belief as to the truth of the
10 allegations of this paragraph, and on that basis denies each and every such
11 allegation.

12 281. Answering paragraph 281, DEFENDANTS state that it is without
13 knowledge or information sufficient to form a belief as to the truth of the
14 allegations of this paragraph, and on that basis denies each and every such
15 allegation.

16 282. Answering paragraph 282, DEFENDANTS state that it is without
17 knowledge or information sufficient to form a belief as to the truth of the
18 allegations of this paragraph, and on that basis denies each and every such
19 allegation.

20 283. Answering paragraph 283, DEFENDANTS state that it is without
21 knowledge or information sufficient to form a belief as to the truth of the
22 allegations of this paragraph, and on that basis denies each and every such
23 allegation.

24 284. Answering paragraph 284, DEFENDANTS state that it is without
25 knowledge or information sufficient to form a belief as to the truth of the
26 allegations of this paragraph, and on that basis denies each and every such
27 allegation.

285. Answering paragraph 285, DEFENDANTS state that it is without knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph, and on that basis denies each and every such allegation.

AFFIRMATIVE DEFENSES

FIRST AFFIRMATIVE DEFENSE

(Failure To State A Claim For Relief)

As a first affirmative defense, DEFENDANTS assert that plaintiffs have failed to state a claim upon which relief may be granted.

SECOND AFFIRMATIVE DEFENSE

(Statute Of Limitations)

As a second affirmative defense, DEFENDANTS assert that plaintiffs' claims are barred by the applicable statute of limitations.

THIRD AFFIRMATIVE DEFENSE

(Lack Of Subject Matter Jurisdiction)

As a third affirmative defense, DEFENDANTS assert that plaintiffs' claims are barred for a lack of subject matter jurisdiction because they lack valid copyright registrations for the intellectual property rights asserted, or have not properly or timely registered their works.

FOURTH AFFIRMATIVE DEFENSE

(Fair Use)

As a fourth affirmative defense, DEFENDANTS assert that plaintiffs' claims are barred by the doctrine of fair use.

1 FIFTH AFFIRMATIVE DEFENSE

2 (Laches)

3 As a fifth affirmative defense, DEFENDANTS assert that plaintiffs' claims
4 are barred by the doctrine of laches.

5
6 SIXTH AFFIRMATIVE DEFENSE

7 (Unclean Hands)

8 As a sixth affirmative defense, DEFENDANTS assert that plaintiffs' claims
9 are barred by the doctrine of unclean hands.

10
11 SEVENTH AFFIRMATIVE DEFENSE

12 (Waiver)

13 As a seventh affirmative defense, DEFENDANTS assert that plaintiffs'
14 claims are barred by waiver.

15
16 EIGHTH AFFIRMATIVE DEFENSE

17 (Invalidity Or Unenforceability Of Copyright)

18 As a eighth affirmative defense, DEFENDANTS assert that plaintiffs'
19 claims are invalid and/or unenforceable.

20
21 NINTH AFFIRMATIVE DEFENSE

22 (Safe Harbor)

23 As a ninth affirmative defense, DEFENDANTS assert that plaintiffs' claims
24 are barred under the Digital Millennium Copyright Act, 17 U.S.C., §1201, *et seq.*

TENTH AFFIRMATIVE DEFENSE

(Authorized Use)

As a tenth affirmative defense, DEFENDANTS assert that plaintiffs' authorized, impliedly or explicitly, DEFENDANTS' allegedly infringing use of their works, and that their claims are therefore barred by the doctrine of implied license.

ELEVENTH AFFIRMATIVE DEFENSE

(Failure To Mitigate Damages)

As an eleventh affirmative defense, DEFENDANTS assert that to the extent that plaintiffs may have suffered damages (which DEFENDANTS deny), plaintiffs have failed to take the steps necessary to mitigate the damages sustained.

TWELFTH AFFIRMATIVE DEFENSE

(Forfeiture Or Abandonment)

As a twelfth affirmative defense, DEFENDANTS assert that plaintiffs' are barred to the extent that they have forfeited or abandoned their intellectual property.

THIRTEENTH AFFIRMATIVE DEFENSE

(Misuse Of Copyright)

As a thirteenth affirmative defense, DEFENDANTS assert that plaintiffs' claims are barred by the doctrine of misuse of copyright.

FOURTEENTH AFFIRMATIVE DEFENSE

(Substantial Non-infringing Use)

As a fourteenth affirmative defense, DEFENDANTS assert that plaintiffs'

1 claims are barred because they cannot establish that DEFENDANTS are incapable
2 of substantial non-infringing use.

3
4 **FIFTEENTH AFFIRMATIVE DEFENSE**

5 (Innocent Intent)

6 As a fifteenth affirmative defense, DEFENDANTS assert that plaintiffs'
7 claims are barred, in whole or in part, because DEFENDANTS' conduct was in
8 good faith and with non-willful intent.

9
10 **SIXTEENTH AFFIRMATIVE DEFENSE**

11 (17 U.S.C. §109, and Exhaustion)

12 As a fifteenth affirmative defense, DEFENDANTS assert that plaintiffs' are
13 barred under 17 U.S.C. §109 and the doctrine of exhaustion.

14
15 **SEVENTEENTH AFFIRMATIVE DEFENSE**

16 (Lack Of Volitional Act)

17 As a second affirmative defense, DEFENDANTS assert that plaintiffs'
18 claims are barred because the alleged infringement was not caused by a volitional
19 act attributable to DEFENDANTS.

20
21 **EIGHTEENTH AFFIRMATIVE DEFENSE**

22 (Additional Defenses)

23 DEFENDANTS reserve the right to supplement or amend this answer,
24 including the addition of further affirmative defenses, based upon the course of
25 discovery and proceedings in this action.

1 WHEREFORE, DEFENDANTS pray for judgement as follows:

- 2 1. That plaintiffs take nothing by its complaint;
- 3 2. That plaintiffs' complaint be dismissed with prejudice;
- 4 3. That defendants be awarded their costs incurred including their
- 5 attorneys' fees; and
- 6 4. That this Court Order such other and further relief for defendants as it
- 7 may deem just and proper.
- 8

9 Dated: May 7, 2015

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10
11
12 By: 

13 FRANCIS S. RYU
14 Attorneys for Defendants
15 CLUB TVPAD, INC. and
16 BENNETT WONG
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